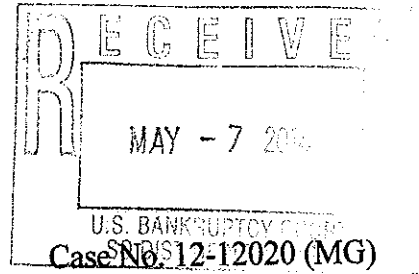


**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RESIDENTIAL CAPITAL, LLC., et al.,

Debtors.



Chapter 11

Jointly Administered

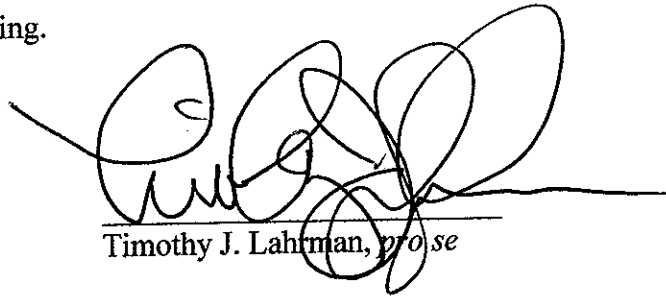
NOTICE OF MOTION

PLEASE TAKE NOTICE that on this date Timothy J. Lahrman did filed his Rule 8002(c) motion to extend the deadline for filing a Notice of Appeal together with a supporting declaration and that a hearing will be held on this motion before the Honorable Martin Glenn of the United States Bankruptcy Court for the Southern District of New York (the "**Bankruptcy Court**"), in Room 501, One Bowling Green, New York New York 10004-1408, on a date to be set by the Court and at the Court's earliest convenience.

PLEASE TAKE FURTHER NOTICE that responses or objections to the Motion and relief requested therein, if any, must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, shall set forth the basis for the objection and the specific grounds therefore and shall be filed with the Bankruptcy Court electronically in accordance with General Order M-399, by registered users of the Bankruptcy Court's case filing system (the User's Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov> , the official website for the Bankruptcy Court), with a hard copy delivered directly to Chambers and served, so as to be received no later than ____ days prior to the scheduled hearing or as otherwise specified by any order from the Bankruptcy Court, upon all parties to whom notice and service is due in these proceedings.

PLEASE TAKE FURTHER NOTICE that if you do not timely file and serve a written response to the relief requested in the Motions, the Bankruptcy Court may deem any opposition waived, treat the Motions as conceded, and enter an order granting the relief requested in the motion without further notice or hearing.

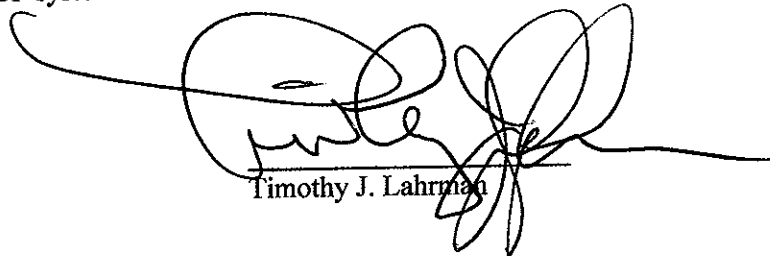
Dated: May 6, 2014



Timothy J. Lahrman, *pro se*

CERTIFICATE OF SERVICE

I hereby certify that I am not an ECF/Pacer subscriber with access to electronic filing yet on May 6, 2014, via U.S. Postal Service over-night prepaid Priority Mail Express (article # EK 0770586 US) I filed the foregoing pleading or paper with the Clerk of the Court who, by entering the document into the CM/ECF system will cause to be sent a copy of this filing on all parties of record who are registered in and subscriber to the CM/ECF system and identified to receive Notice in these proceedings.



Timothy J. Lahrman

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RESIDENTIAL CAPITAL, LLC., et al.,

Debtors.

Case No. 12-12020 (MG)

Chapter 11

Jointly Administered

MOTION TO EXTEND DEADLINE

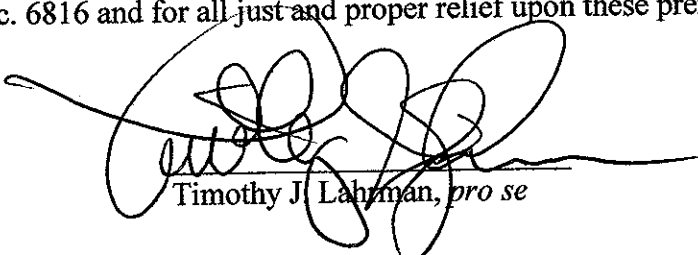
Pursuant to Bankruptcy Rule 8002(c) Lahrman respectfully requests that the deadline for filing a notice of appeal regarding Doc. 6816 be extended .

In support of this motion Lahrman submits his Declaration which accompanies this filing.

This motion is being made on or before the deadline for filing the notice of appeal and is therefore timely made.

Wherefore Lahrman prays for an Order from this Court extending the deadline to file a notice of appeal concerning Doc. 6816 and for all just and proper relief upon these premises.

Dated: May 6, 2014


Timothy J. Lahrman, *pro se*

CERTIFICATE OF SERVICE

I hereby certify that I am not an ECF/Pacer subscriber with access to electronic filing yet on May 6, 2014, via U.S. Postal Service over-night prepaid Priority Mail Express (article # EK 0770586 US) I filed the foregoing pleading or paper with the Clerk of the Court who, by entering the document into the CM/ECF system will cause to be sent a copy of this filing on all parties of record who are registered in and subscriber to the CM/ECF system and identified to receive Notice in these proceedings.


Timothy J. Lahrman

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RESIDENTIAL CAPITAL, LLC., et al.,

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Case No. 12-12020 (MG)

Chapter 11

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DECLARATION OF TIMOTHY J. LAHRMAN

I, Timothy J. Lahrman, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I make this declaration on the basis of my personal knowledge of the facts stated herein;

2. On May 5, 2014 at approximately 7:30 pm (EST) I received an email from an acquaintance in Chicago alerting me to the fact that she tripped across an internet website where court documents bearing my name were posted. In particular, I was sent a link to the Declaration of Robert Ellis as the same has been filed in the record of these proceedings.

3. On May 5, 2014 at approximately 9:00 pm (EST) I myself found on a Google internet search Doc. 6816 filed on April 23, 2014 in the above entitled cause. Doc. 6816 is the "Memorandum Opinion and Order Denying Timothy J. Lahrman's Motion For Reconsideration Of Order Enforcing The Chapter 11 Plan Injunction".

4. I was never served with a copy of Doc. 6816 by either the Court or Ally Financial, Inc.¹ and, because I am appearing pro se in this matter and not a ECF/Pacer user or subscriber I never received Notice of the entry of Doc. 6816.

1. As relating to AFI's effort to enjoin my state court action by these proceedings in this Court I have consistently received from AFI multiple copies of all their documents and the prior order entered in this matter. To the extent that I received 'multiple copies' I found it somewhat harassing and dizzying to be receiving the same documents from both the New York and Chicago offices of AFI's legal counsel, and the law firm of record in the state court action, sent by both FedEx, regular mail and even by private process server, and yet I was not sent Doc. 6816.

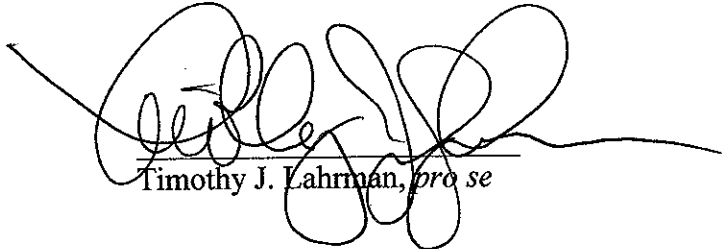
5. As I understand the rules of bankruptcy procedure the deadline for my filing a Notice of Appeal regarding 6816 is May 7, 2014 however, in the absence of adequate notice and service and in light of my surprise find and latent discovery of Doc. 6816 the time for me to research what is needed and prepare a notice of appeal before the filing deadline is inadequate due to no fault or neglect of my own doing.²

6. This Declaration is submitted in support of my Rule 8002(c) motion for an extension of time to file and serve a Notice of Appeal regarding Doc. 6816 as the same was entered in this matter on April 23, 2014.

2. Again, and as averred previously, because I am appearing pro se and not an ECF/Pacer user and subscriber and because I must rely on filing by the US Mail from approximately 690 miles away, my meaningful and equal access to this Court is unduly prejudiced where computations of times and deadlines are implicated.

I swear and affirm under the penalties of perjury that the foregoing facts and representations are true and within the best of my personal knowledge.

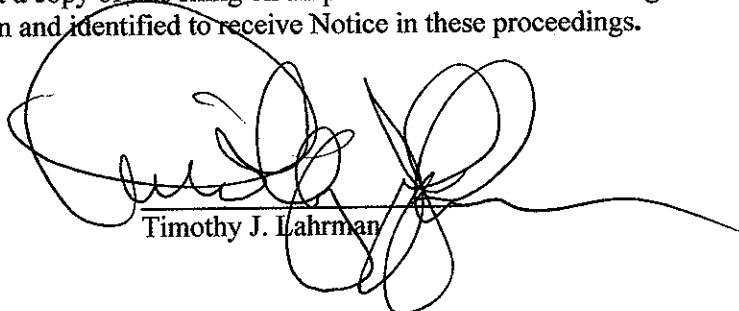
Dated: May 6, 2014



Timothy J. Lahrman, *pro se*

CERTIFICATE OF SERVICE

I hereby certify that I am not an ECF/Pacer subscriber with access to electronic filing yet on May 6, 2014, via U.S. Postal Service over-night prepaid Priority Mail Express (article # EK 077052786 US) I filed the foregoing pleading or paper with the Clerk of the Court who, by entering the document into the CM/ECF system will cause to be sent a copy of this filing on all parties of record who are registered in and subscriber to the CM/ECF system and identified to receive Notice in these proceedings.



Timothy J. Lahrman